



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

July 21, 2023

**By ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Reclaim the Records et ano. v. United States Department of State*, No.  
23 Civ. 1471 (JMF)

Dear Judge Furman:

This Office represents the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 522. As requested by Your Honor, ECF Nos. 6, 13, and 15, on behalf of the Government, and together with the Plaintiffs, I write respectfully to advise that there is no need for discovery or an initial conference in this case. The parties also request a 45-day extension of the deadline for the Government to respond to the complaint (*i.e.*, from July 25 to September 8, 2023). Finally, the parties propose the following briefing schedule for summary judgment: October 8: Government’s motion; November 10: Plaintiffs’ opposition; December 1: Government’s reply.

This is the second request by either party for an extension of time to respond to the complaint. The Court had previously extended that deadline *sua sponte* from April 28 to May 26, 2023, ECF No. 11, and then at the parties’ request to July 25, 2023, ECF No. 15. The proposed schedule will allow the parties to conclude their discussions regarding whether the case can be resolved without further Court intervention, and, in the event briefing becomes necessary, accommodate Plaintiffs’ counsel’s imminent parental leave and the undersigned’s anticipated vacation plans.

We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

By: /s/ Joseph A. Pantoja  
JOSEPH A. PANTOJA  
Assistant United States Attorney  
Tel.: (212) 637-2785

cc: Plaintiffs’ Counsel (By ECF)

Application GRANTED.  
Defendant's motion for  
summary judgment is due  
October 8, 2023. Plaintiffs'  
opposition is due November 10,  
2023. Defendants' reply is due  
December 1, 2023. The Clerk  
of Court is directed to terminate  
ECF No. 16.

SO ORDERED.

July 24, 2023